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U.S. BANKRUPTCY COURT
MARY A. SHOTT, CLERK

1 **NOT**
2 Thomas T. Pham
3 Oanh T. Pham
4 7624 Golden Lantern Court
5 Las Vegas, Nevada 89139

6 **UNITED STATES BANKRUPTCY COURT**

7 **DISTRICT OF NEVADA**

8 In Re:

9 Pham, Thomas T.
10 Pham, Oanh T.

11 Debtor(s).

)
) Case No.: 09-25519

)
) **MOTION TO RE-VALUE COLLATERAL**
) **PURSUANT TO 11 U.S.C. §506(a) AND**
) **§1322**
)
)
)
)

12
13 **MOTION TO RE-VALUE COLLATERAL**

14
15 **PURSUANT TO 11 U.S.C. §506(a) AND §1322**

16 **COMES NOW**, Debtors above-named, in proper person, and hereby moves this
17 Honorable Court to re-value collateral, in this matter.

- 18 1. The debtors currently own the property located at (hereinafter the "subject property").
19 2. The value of the Subject property is \$446,534.00.
20 3. The Subject Property is subject to a priority lien by WELLS FARGO HOME
21 MORTGAGE in the amount of \$570,000.00.
22 4. Currently the property holds no equity and is considered upside down by \$123,466.00.
23 5. Debtor's have filed the instant action, and requests a loan modification for the subject
24 property.
25

26 **WHEREFORE**, Debtors pray for the following:

- 27 1. Grant Debtor's **MOTION TO RE-VALUE COLLATERAL PURSUANT TO**
28 **11 U.S.C. §506(a) AND §1322**, in its entirety;

2. Such other relief as the Court deems just and proper.

DATED this 19 day of NOV, 2009.

Submitted by:

(Debtor) Original Signature

Thomas T. Pham
7624 Golden Lantern Court
Las Vegas, Nevada 89139

Submitted by:

(Joint Debtor) Original Signature

Oanh T. Pham
7624 Golden Lantern Court
Las Vegas, Nevada 89139

CERTIFICATE OF SERVICE

I hereby certify that I, Maggie Niezgoda, served the foregoing **NOTICE OF MOTION AND MOTION TO RE-VALUE COLLATERAL PURSUANT TO 11 U.S.C. §506(a) AND §1322** by depositing a true copy thereof into the U.S. Mails, postage prepaid and addressed to the following:

Wells Fargo Home Mortgage
PO Box 10368
Des Moines, IA 50306

Maggie Niezgoda